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## TEXAS CATTLE FEEDERS ASSOCIATION

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Agricultural Marketing Service  
USDA STOP 0249, Room 2092-S  
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Washington, D.C. 20250-0249  
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### Docket No. LS-02-16

Texas Cattle Feeders Association commends USDA for requesting comments on the recordkeeping requirements for country of origin labeling. Our comments will be limited to recordkeeping for cattle and beef.

We believe recordkeeping costs will be significant and USDA estimates may be too low. The basis for this belief is that cattle generally have two or more producers and more than one "handler." Also, records will have to be kept on all cattle, even though about 50% of all beef will not have to be labeled.

The first producer is the cow-calf producer. The yearling operator is the second producer, followed by the feeder as the third producer. Normally the first "handler" is the auction market where the calf is sold to the second "handler," the order buyer, who sells the calf to the yearling operator, who then normally sells the yearling through another "handler"—an order buyer or auction market—to the cattle feeder.

This scenario is typical of the industry—three owners and three handlers are involved in the production and marketing of one animal. In many cases, cattle are co-mingled in each step of the above example, which further complicates the keeping of a verifiable recordkeeping audit trail. Without identification of each animal, the complexities are enormous.

The complexities of a recordkeeping system for beef are even greater because the animal is fabricated into numerous cuts, plus the co-mingling of trimmings used to produce ground beef.

Country of origin labeling for fruits and vegetables, where there is one producer and normally one handler (processor) is a rather simple process—unlike the beef industry. USDA's attempt to use the same logic for beef and vegetables to estimate costs is not valid.

We believe that USDA's interpretation of the Act is correct—a tremendous amount of recordkeeping will be required to verify country of origin labeling. Because of the overwhelming complexities of the cattle and beef industry, we do not have suggestions for streamlining recordkeeping and be in compliance with the Act.

Sincerely,

Richard McDonald  
President & CEO